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2023 MAY 30 AM 11:09

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Eric M. Gravel,

o/b/o himself and all

others similarly situated,

plaintiffs,

v.

Hearst Television, Inc.,

City of Winooski, Vermont,

Town of Colchester, Vermont,

City of Burlington, Vermont,

including their police departments

and elected officials,

defendants.

VERIFIED COMPLAINT

AND JURY DEMAND

State of Vermont.)

) ,ss:

County of Chittenden)

ERIC M GRAVEL, ON OATH, DEPOSES AND SAYS AS FOLLOWS:

1. Plaintiff, Eric Gravel, is an individual residing in Chittenden County, Vermont.
2. Defendants have harassed, falsely arrested, libeled, assaulted and battered, and defrauded Mr Gravel not only individually but also collectively, in concert with, and in conspiracy with, one another. Others have similarly suffered as will be alleged in an amended complaint to follow.
3. Mr Gravel has, as a proximate result of Defendants' Acts and Omissions, been damaged and continues to be damaged...as have many others...in amounts which will be proven at trial.

JURISDICTION

4. **Federal Question**. Mail, wire, bank fraud, civil R.I.C.O.; 42 U.S.C. Sec. 1983. Pendent jurisdiction additionally.

VENUE

5. **Venue** is proper in this judicial district, as the defendant, Hearst Television, Inc., is headquartered in New York City; and, further, under principles governing conspiracy and **forum non conveniens** (Mr Gravel could not get a fair trial in Vermont).

COUNT ONE – Fraud

6. ONE through FIVE above are incorporated by reference.
7. Defendants' false representations (and/or conduct amounting to representations) comprise common law fraud.
8. Defendants' fraud has proximately caused damages to plaintiffs in amounts to be proven at trial in an amount well into seven figures.

COUNT TWO – RICO

9. One through eight are incorporated by reference.
10. Defendants have conducted an enterprise through a pattern of racketeering activity (mail, wire, common law fraud) proximately causing damage to plaintiffs' businesses or properties in amounts to be proven at trial well into seven figures.

COUNT THREE—CIVIL RIGHTS

11. One through 10 are incorporated by reference.
12. Defendant' torts have violated Mr Gravel's (and many others') civil rights comprising state action in violation of 42 U.S.C. sec 1983, proximately causing damages as will be proven at trial.

SUBSCRIBED AND SWORN UNDER THE PAINS AND PENALTIES OF PERJURY THIS 9th DAY OF MAY 2023.

(see below)

WHEREFORE plaintiffs demand judgment

- Awarding damages in amounts to be proven at trial, trebled pursuant to statute, plus legal fees, interest, and costs; and
- Preliminarily and permanently enjoining defendants from further illegal conduct injurious to plaintiff(s); and
- Granting such other and further relief as the Court may see fit.

JURY TRIAL IS DEMANDED ON ALL ISSUES SO TRIABLE HEREIN.

respectfully submitted,

ERIC M. GRAVEL

ro se

Subscribed and sworn (see above)

Eric M. Gravel

A handwritten signature in black ink, appearing to read 'Eric M. Gravel', is written over a horizontal line.

Eric M. Gravel

individually and on behalf of all

others similarly situated

137 PineStreet

Winooski, VT 05404

(802) 424.5095

emgfreeman@gmail.com

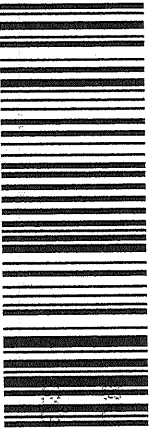
- 1.a Ex Parte Motion For Short Order of Notice
- VERIFIED COMPLAINT AND JURY DEMAND
- 2.a cover Letter

TO Clerk, Civil, United States District Court for the Southern District of New York, 500 Pearl
Street, New York, NY 10007

Eric Gravel
137 Presnell
Winoski VT

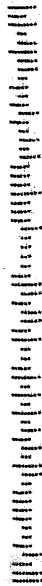
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Pro Se

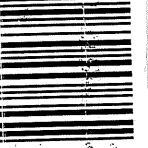


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